# AFFIDAVIT OF LORI A. CRESEY, DIRECTOR OF CLASSIFICATION
## MASSACHUSETTS DEPARTMENT OF CORRECTION

I, Lori A. Cresey, hereby depose and state as follows:

1. I am currently employed by the Massachusetts Department of Correction ("DOC") in the position of Director of Classification. I have held this position since 2012.

2. As the Director of Classification I am responsible for the classification and placement of almost 10,000 inmates under the jurisdiction of the DOC. I oversee the Victim Services Division, the Transfer Unit, and the County, Federal and Interstate Unit. I am a Commissioner's designee for classification placements, making the final decision with regard to an inmate's custody level and facility placement.

3. I began my career with the DOC in 1987. Before I was promoted to Director, I was the Deputy Director of Classification for the DOC from 2006 until 2012. Prior to that position I was the County, Federal and Interstate Manager for ten years.

4. I am familiar with the case of Casandra B. Littles and have also read her letter to the Court dated May 11, 2016.

5. Ms. Littles is restricted to medium custody at MCI-Framingham even though she scores minimum/pre-release custody via DOC's Objective Point Base Classification system. On 8/28/15 I personally denied inmate Littles' request for minimum custody based on her federal consecutive sentence.

6. The program that I believe Ms. Littles is referring to in her letter, that her federal sentence is restricting her from, is minimum and pre-release custody. In

Massachusetts minimum or pre-release is a custody level not a program. There is only one program that I am aware of at SMCC that is not at MCI-Framingham and that is Family Unification House where inmates spend time in a house on the grounds with their children overnight.

7. Since commitment Ms. Littles has participated in numerous programs: Life in Recovery, peer mentor for Life in Recovery, Computer, Boston University entrance prep class, Cognitive Skills Workshop. She has remained disciplinary report free throughout her incarceration and does not work.

8. The custody level and facility Ms. Littles seeks is minimum/pre-release custody at South Middlesex Correctional Center ("SMCC"). SMCC is an unfenced community corrections facility. Minimum custody inmates are allowed to work outside the facility on work crews supervised by staff at all times. Pre-release custody inmates work at regular jobs in the community without the constant supervision of DOC staff.

9. Ms. Littles' federal consecutive sentence makes her ineligible for minimum or pre-release custody for the duration of her DOC sentence.

10. I did not suggest that Ms. Littles try to get her federal sentence revised nor am I aware of any DOC staff that did.

11. If Ms. Littles were to have her federal sentence revised to a concurrent sentence that is absorbed into her DOC sentence or if the sentence was vacated completely there would no longer be a restriction from minimum or pre-release custody and

she would immediately become eligible for those custody levels based on her Objective Point Base Score and lack of other restrictions.

Signed under the pains and penalties of perjury this 21st day of July 2016.

Lori A. Cresey